

Exhibit T

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

George DC Parker II, and

Lori A Parker,

Plaintiff(s),

v.

THE SOCIETY FOR CREATIVE :
ANACHRONISM, INC., a/k/a/ "SCA"

:
or "SCA, Inc.", et.al,

Defendant(s).

Case No. 3:23-cv-05069-RJB 'S
PLAINTIFFS GEORGE
DC PARKER II AND LORI A. PARKER
SECOND INTERROGATORIES AND
REQUESTS TO DEFENDANT THE
SOCIETY FOR
CREATIVE ANACHRONISM, INC.

PLAINTIFF'S SECOND SET OF INTERROGATORIES TO DEFENDANT

Pursuant to Fed. R. Civ. P. 33, Plaintiff hereby submits the following Interrogatories to Defendant. Plaintiff requests that Defendant serve its answers, in writing and under oath, to the Plaintiff at 10710 199Th St E, Graham, Wa. 98338, within 30 days of service of these Interrogatories.

This is to inform defendants that the following interrogatories are considered ongoing, and any new information, including any changes, opinions or arguments that differ from those in defendants' responses related to these interrogatories, which defendants obtain after the date of answering these interrogatories and until the date of trial, must be provided to Plaintiffs as soon as such information is obtained.

The Plaintiff STRONGLY objects to Defendants allegation that Plaintiffs will use information gathered during Discovery. The Defendants' claims that the Plaintiffs will misuse

1 any information obtained in this lawsuit to harm, threaten or unlawfully target any person
2 involved in this case are unfounded and baseless. The Plaintiffs, who are representing themselves
3 in this matter, are subject to the same ethical and professional standards as the Defendants'
4 lawyers.

5 Plaintiff's object to Defendants lack of answers to their interrogatories. Defendants have
6 failed to comply with the Rules of Discovery by providing incomplete, vague, evasive, and
7 boilerplate answers that do not address the specific questions asked. Defendants have also failed
8 to produce documents responsive to the requests for production, despite having ample time and
9 opportunity to do so. Defendants' use of copy/paste without regard to the question causes their
10 answers to be irrelevant and/or inapplicable to the question asked or the request for production,
11 leaving their answers unresponsive and in clear violation of the standards for Discovery
12 Response, as noted in Rule 34.

13 Fischer v. Forrest, Nos. 14-1304, 14-1307, 2017 U.S. Dist. LEXIS 28102, at *2 (S.D.N.Y.
14 Feb. 28, 2017). The Fischer court concluded by noting that attorneys have had ample time since
15 the Rule 34 amendment to update their response practices, and warning that from that point on,
16 "any discovery response that does not comply with Rule 34's requirement to state objections
17 with specificity (and to clearly indicate whether responsive material is being withheld on the
18 basis of objection) will be deemed a waiver of all objections (except as to privilege)." Sobol v.
19 Imprimis Pharm., No. 16-14339, 2017 U.S. Dist. LEXIS 184478, at *11 (E.D. Mich. Oct. 26,
20 2017) (citing Fischer in holding that "boilerplate objections are legally meaningless and amount
21 to a waiver of an objection"). Since Defendants appear to have waived all objections, as noted
above, Plaintiffs expect full and complete responses to the following interrogatories and requests
for production.

1 For the purpose of these Interrogatories only, Plaintiff has used the definitions set forth
2 below.

3 **I. Definitions as used in these Interrogatories:**

- 4 1. "Defendant" means the SCA, its officers and/or representatives.
- 5 2. "Any" means one or more.
- 6 3. "Communication" refers to any form of sharing, transmitting, or exchanging information
7 or opinion among parties, such as oral conversations, text, email, social media postings,
8 or US postal service. The scope of "communication" is restricted to the SCA or its
9 members, and explicitly EXCLUDES any communication between a client and their
10 attorney.
- 11 4. "Officer" means any person that is warranted or unwarranted that holds a position within
12 the SCA other than that of a general populace member. "Officer" can include but is not
13 limited to: Members of the Board of Directors, Seneschal, Social Media officer, etc. as
14 defined by the Corporate documents. "Officer" can also include those holding the titles of
15 King, Queen, Baron and Baroness.
- 16 5. "An Tir" means the land area described as a "kingdom" by the SCA that encompasses the
17 states of Oregon, Washington, parts of Idaho and parts of Canadian British Columbia.
- 18 6. "BOD" means any member of the Board of Directors, or the Board, collectively.
- 19 7. The phrase "describe in detail" as used in these interrogatories includes a request for a
20 complete description and explanation of the facts that includes circumstances, names,
21 dates, analysis, opinion and other facts and information relating to the subject matter of a
specific interrogatory.
8. The terms "document" and/or "writing" mean and include, but are not limited to, any
printed, typewritten, or handwritten matter of whatever character, and every other form of

1 recording upon any tangible thing including texts, emails, screenshots and facsimiles. The
2 term "document" also includes electronically stored data from which information can be
3 obtained either directly or by translation through detection devices or readers; any such
4 document is to be produced in a reasonably legible and usable form. The term
5 "document" includes all drafts of a document and all copies that differ in any respect
6 from the original, including any notation, underlining, marking, or information not on the
7 original. The term also includes information stored in, or accessible through, computer or
8 other information retrieval systems (including any computer archives or back-up
9 systems), together with instructions and all other materials necessary to use or interpret
10 such data compilations. The scope of "document" is restricted to the SCA or its members,
11 and explicitly EXCLUDES any communication between a client and their attorney.

12 9. "Identify" or "identity" means to state or a statement of:

13 In the case of a natural person, his or her name, business address and telephone number,
14 employer, and title or position;

- 15 a. in the case of a communication, its date, type (e.g., telephone conversation or
16 discussion), the place where it occurred, the identity of the person who made the
17 communication, the identity of the person who received the communication, the
18 identity of each other person when it was made, and the subject matter discussed;
- 19 b. in the case of a document, the title of the document, the author, the title or
20 position of the author, the addressee, each recipient, the type of document, the
21 subject matter, the date of preparation, and its number of pages; and
- c. in the case of a communication, its date, the place where it occurred, the identity
of all persons who were parties to the conversation, the identity of each person

1 who has knowledge of the conversation and all other persons present when it
2 happened, and the subject matter of the conversation.

3 10. "Including" means including, but not limited to.

4 11. "Person" means any natural person, corporation, company, partnership, joint venture,
5 firm, association, proprietorship, agency, board, authority, commission, office or other
6 business or legal entity, whether private or governmental.

7 12. "You," "your" or "your company" means the SCA, Defendant

8 13. The singular form of a noun or pronoun shall be considered to include within its meaning
9 the plural form of the noun or pronoun, and vice versa; and the past tense shall include
10 the present tense where the clear meaning is not distorted. The term "or" shall mean
11 "and" and vice-versa, as necessary to bring within the scope of the following
12 interrogatories all information or documents that would be excluded absent this
13 definition.

14 **II. Instructions**

15 14. Unless otherwise specified, these interrogatories are limited to the time period from
16 January 1, 2017, up to and including the date of service of these interrogatories.

17 15. Where knowledge, information, or documents are requested, such request encompasses
18 knowledge, information or documents in defendant's possession, custody or control, or in
19 the possession, custody or control of defendants staff, agents, employees, representatives
20 and, unless privileged, attorneys, or any other person who has possession, custody or
21 control of defendants proprietary knowledge, information or documents.

16 Pursuant to Fed. R. Civ. P. 26(e), you are under a duty to amend any answer to these
17 interrogatories for which you learn that the answer is in some material respect incomplete

1 or incorrect and if the additional or corrective information has not otherwise been made
2 known to us during the discovery process or in writing.

3 17. For any interrogatory or part of an interrogatory which you refuse to answer under a
4 claim of privilege, submit a sworn or certified statement from your counsel or one of your
5 employees in which you identify the nature of the information withheld; specify the
6 grounds of the claimed privilege and the paragraph of these interrogatories to which the
7 information is responsive; and identify each person to whom the information, or any part
8 thereof, has been disclosed.

9 18. Answer each interrogatory fully. If you object to any interrogatory, state the reasons for
10 objection and answer to the extent the interrogatory is not objectionable. If you are
11 unable to answer an interrogatory fully, submit as much information as is available,
12 explain why your answer is incomplete, and identify or describe all other sources of more
13 complete or accurate information.

14 19. For any record or document responsive or relating to these interrogatories which is
15 known to have been destroyed or lost, or is otherwise unavailable, identify each such
16 document by author, addressee, date, number of pages, and subject matter; and explain in
17 detail the events leading to the destruction or loss, or the reason for the unavailability of
18 such document.

19 **III. Claims of Privilege**

20 A document that is protected by attorney-client privilege or work product privilege
21 should not be disclosed to the requesting party. However, you must still list the document
in your written response and provide the following information for each privileged
document: (a) the date it was created; (b) the name of the person who wrote it; (c) the
name of the person who received it; (d) the type of document, such as a memo, a letter,

1 etc.; (e) the names of any other persons who have a copy of the document; and (f) the
2 general topic of the document.

3
4 **INTERROGATORY NO. 1:** What binding actions, authorities and/or powers were granted to
5 the Kingdom of An Tir Officers from January 1, 2017 to December 31, 2021, up to and including
6 but not limited to all sanctions they have the right to levy, what criteria will be used in deciding
7 those sanctions, and what infractions by the members might warrant such sanctions?

8 **Answer:**
9
10

11 **REQUEST FOR PRODUCTION NO. 1:** Please provide all documentation of any rules for
12 that were in effect January 1, 2017 to December 31, 2021 that supports your answer in
13 Interrogatory No. 1

14 **REQUEST FOR PRODUCTION NO. 2:** Please provide all communications and documents
15 that include or reference the names of Plaintiffs, and their business, including any previous
16 investigations wherein the Plaintiffs are named from January 1, 2017 to December 31, 2021.

17 **INTERROGATORY NO. 2:** Describe in detail what training Society Officers and An Tir
18 Officers (including seneschal, Crowns and Coronets, Exchequers, Heralds, Social Media and
19 other Great Officers as defined by Corporate documents) are required to have prior to taking
20 office and/or what training these specific Officers are required to receive after taking office in
21 relation to their duties and responsibilities of their respective position within the organization?

1 **Answer:**

2
3
4 **REQUEST FOR PRODUCTION 3:** Please provide all documentation of any rules that
5 supports your answer to interrogatory question no. 2.
6

7 **INTERROGATORY NO. 3:** Please describe in detail the conflict resolution training Society
8 Officers and An Tir Officers are required to participate in from January 1, 2017 to December 31,
9 2021.

10 **Answer:**

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12
13 **REQUEST FOR PRODUCTION 4:** Please provide all documentation of any rules that were in
14 effect from January 1, 2017 to December 31, 2021 that outlines all criteria by which the BOD
15 determines that a case brought to them necessitates further investigation for a revocation of
16 membership.

17 **REQUEST FOR PRODUCTION NO. 5:** Please provide all documentation of any rules in
18 effect from January 1, 2017 to December 31, 2021 that outline any documentation required for
19 the BOD to bring sanctions, including but not limited to, standards of proof required to lend
20 merit to any allegations made against a member being considered for sanctions.
21

1 **REQUEST FOR PRODUCTION NO. 6:** Please provide all documentation of any rules that
2 were in effect January 1, 2017 to December 31, 2021 that outlines how the Society Officers and
3 Officers in An Tir are chosen.

4 **REQUEST FOR PRODUCTION NO. 7:** Please provide all documentation of any rules in
5 effect from January 1, 2017 to December 31, 2021 that outline all required qualifications for
6 Society Officers and Officers in An Tir.

7 **REQUEST FOR PRODUCTION NO. 8:** Please provide all communications and
8 documentation relating to the appointment of the Baron and Baroness for the Barony of Blatha
9 An Or in 2017 - 2020, including but not limited to polling sheets, letters of recommendation,
10 letters opposing any candidates, email, texts or any other written communications in reference to
11 the candidates for those polling years.

12 **REQUEST FOR PRODUCTION NO. 9:** Please provide all documentation of any rules in
13 effect from January 1, 2017 to December 31, 2021 that outlines what legally binding
14 actions/authorities/powers are granted to the seneschals of the Society and An Tir, including but
15 not limited to all sanctions they have the right/power to levy, what criteria will be used in
16 deciding those sanctions, and what infractions by the members might warrant such sanctions.

17 **REQUEST FOR PRODUCTION NO. 10:** Please provide all documentation of all members
18 who have had their membership revoked in the past 5 years.

19
20 **INTERROGATORY NO. 4:** Describe in detail the infractions that resulted in revocation of
21 memberships in the last 5 years.

1 **Answer:**

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3
4 **REQUEST FOR PRODUCTION NO. 11:** Please provide all documentation that shows the
5 total number of members who have had their membership revoked who were from the Kingdom
6 of An Tir in the last 5 years.

7
8 **REQUEST FOR PRODUCTION NO. 12:** Please provide all documentation that shows the
9 total number of members who have had their membership revoked within the Kingdom of An Tir
10 that were, or claimed to be DEI (Diversity, Equity and Inclusion) related or who raised questions
11 of DEI aspects during the investigation into the incident and/or actions that led to the
12 Revocation.

13 **REQUEST FOR PRODUCTION NO 13:** Please provide all documentation of any rules in
14 effect from January 1, 2017 to December 31, 2021 that outlines the criteria and/or qualifications
15 for any level investigator for Society Officers and Officers in An Tir.

16
17 **INTERROGATORY NO. 5:** Please describe in detail any rules in effect from January 1, 2017
18 to December 31, 2021 that outlines all training a Society investigator or an An Tir investigator,
19 shall or has received in relation to conducting such an investigation, including but not limited to
20 dispute resolution training, investigation training, interrogation training, knowledge or
21 experience with dispute resolution laws and regulations, knowledge of or experience in
managing and resolving disputes effectively.

1 **Answer:**

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5 **REQUEST FOR PRODUCTION NO. 14:** Please provide all documentation in support of your
6 answer to interrogatory no 5.

7 **INTERROGATORY NO. 6:** Please describe in detail any rules that outline what the corporate
8 dispute policies and resolution paths were from January 1, 2017 to December 31, 2021 including
9 who presides over dispute matters, what qualifications are required for the dispute
10 advocates/judges etc.

11 **Answer:**

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14 **REQUEST FOR PRODUCTION NO. 15:** Please provide all documentation of training,
15 including dispute resolution training, for all seneschals and investigators for the Society and An
16 Tir for the time from January 1, 2017 to December 31, 2021.

17 **INTERROGATORY NO. 7** Please describe in detail any rules that outline the criteria for
18 determining whether or not an appeal should be heard and who makes that determination from
19 January 1, 2017 to December 31, 2021.

20 **Answer:**

1
2 **REQUEST FOR PRODUCTION NO. 16:** Please provide all documentation in support of your
3 answer to Interrogatory no 7.

4 **INTERROGATORY NO. 8:** Please describe in detail, how many requests for appeal has the
5 society seneschal received in the past 5 years, including dates for each appeal, and of those, how
6 many have been heard by the BOD for the same period.

7 **Answer:**
8

9 **REQUEST FOR PRODUCTION NO. 17:** Please provide all documentation that supports your
10 answer to question no. 8.

11 **INTERROGATORY NO. 9:** Please describe in detail, out of the number listed in Interrogatory
12 No. 8, the number of revocations that have been successfully overturned by appeal.

13 **Answer:**
14

15 **REQUEST FOR PRODUCTION NO. 18:** Please provide all documentation that supports your
16 answer to Interrogatory No. 9.

17
18 **INTERROGATORY NO. 10:** Please describe in detail the number of sanctions requested by
19 kingdoms in the past 5 years, including dates listed by kingdom.

20 **Answer:**
21

1
2 **REQUEST FOR PRODUCTION NO. 19:** Please provide all documentation that supports your
3 answer to Interrogatory No. 10..

4 **INTERROGATORY NO. 11:** Describe in detail the SCA's current published definition of the
5 difference between a society rule and a society policy.

6 **Answer:**

7
8 **REQUEST FOR PRODUCTION NO. 20:** Please provide all documentation of any rules in
9 effect from January 1, 2017 to December 31, 2021 that outlines what the stated purpose/mission
10 of the SCA and how that relates to Diversity, Equity and Inclusion, political speech, hate speech
11 or other protected speech.

12 **REQUEST FOR PRODUCTION NO. 21:** Please provide all documentation of any rules in
13 effect from January 1, 2017 to December 31, 2021 that outlines the role of the peerage, their
14 status within the corporation including but not limited to their rights, privileges, responsibilities,
15 authorities and powers granted to them.

16 **INTERROGATORY NO. 12:** Describe in detail what reported sanctions definitions in effect
17 from January 1, 2017 to December 31, 2021 automatically go from the Society Seneschal to the
18 BOD for consideration of further sanctions?

19 **Answer:**
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21

1 **REQUEST FOR PRODUCTION NO. 22:** Please provide all documentation that supports you
2 answer to Interrogatory No. 12

3
4 **INTERROGATORY NO. 13:** Describe in detail what criteria in effect from January 1, 2017 to
5 December 31, 2021 establishes the reason a “*Kingdom Sanction: Exile*” from the Kingdom of
6 An Tir may be imposed.

7 **Answer:**
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10 **REQUEST FOR PRODUCTION NO. 23:** Please provide all documentation that supports your
11 answer to Interrogatory No. 13.

12 **INTERROGATORY NO. 14:** Describe in detail what criteria in effect from January 1, 2017 to
13 December 31, 2021 establishes the reason for a “*Kingdom Sanction: Temporary Removal from*
14 *Participation in the Society*” from the Kingdom of An Tir may be imposed.

15 **Answer:**
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18 **REQUEST FOR PRODUCTION NO. 24:** Please provide all documentation that supports your
19 answer to Interrogatory No. 14.
20
21

1 **INTERROGATORY NO. 15:** Describe in detail what is the corporation definition of
2 “Sanction” in effect from January 1, 2017 to December 31, 2021.

3 **Answer:**
4

5 **REQUEST FOR PRODUCTION NO. 25:** Please provide all documentation that supports your
6 answer to Interrogatory No. 15.
7

8 **INTERROGATORY NO. 16:** Describe in detail what are the specific sanctions that the BOD
9 can impose based on the bylaws as defined in the “powers of the board” in effect from January 1,
10 2017 to December 31, 2021.

11 **Answer:**
12
13

14 **REQUEST FOR PRODUCTION NO. 26:** Please provide all documentation that supports your
15 answer to Interrogatory No. 16.
16

17 **INTERROGATORY NO. 17:** Describe in detail what prompted the removal of Emerson Waite,
18 the Crown who initially exiled Plaintiff George Parker?

19 **Answer:**
20
21

1 **REQUEST FOR PRODUCTION NO. 27:** Please provide all documentation that supports
2 your answer to Interrogatory No. 17.

3
4 **INTERROGATORY NO. 18:** Describe in detail the rule that outlines behavior in/on social
5 media postings on private pages in effect from January 1, 2017 to December 31, 2021 for both
6 Society and the Kingdom of An Tir.

7 **Answer:**
8

9 **REQUEST FOR PRODUCTION NO. 28:** Please provide all documentation that supports your
10 answer to Interrogatory No. 18.

11 **INTERROGATORY NO. 19:** Please describe, in detail, what, if any civil action the SCA has
12 ever been involved in including but not limited to all parties involved in the action, stated cause
13 of the action, and the current disposition.

14 **Answer:**
15
16

17 **REQUEST FOR PRODUCTION NO. 30:** Please provide all documentation that supports your
18 answer to Interrogatory No. 19 .

19 **INTERROGATORY NO. 20:** Has any Society Officer or Officer in An Tir, including but not
20 limited to, members of the chivalry, peerage, royalty, or other like elevated representative, or any
21 other designated representative, been accused or convicted of any civil crime, felony or

1 misdemeanor crime while holding office and/or warrant position within the SCA during the
2 years of January 1, 2017 to December 31, 2021.

3 **Answer:**

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6 **REQUEST FOR PRODUCTION NO. 31:** Please provide all documentation that supports
7 your answer to Interrogatory No. 20.

8
9 **INTERROGATORY NO. 21:** How many of those convicted (listed in Interrogatory No. 20)
10 had their membership revoked and when?

11 **Answer:**

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13
14 **REQUEST FOR PRODUCTION NO. 32:** Please provide all documentation that supports your
15 answer to Interrogatory No. 21.

16
17 **INTERROGATORY NO. 22:** Describe in detail any rule that clearly defines Hate Speech and
18 the sanctions or punishments imposed in effect from January 1, 2017 to December 31, 2021 for
19 both Society and the Kingdom of An Tir.

20 **Answer:**

1 **REQUEST FOR PRODUCTION NO. 33:** Please provide all documentation that supports your
2 answer to Interrogatory No. 22.

3
4 **REQUEST FOR PRODUCTION NO. 34:** Please provide all communications and documents
5 from January 1, 2017 to December 31, 2021, that include or reference a members handbook
6 outlining expected behavior and the penalties a member can expect to have levied upon failure to
7 follow the rules as listed.

8 Dated: October 3, 2023

9 Respectfully submitted,

10 
11

12 George DC Parker II, and

13
14 
15

16 Lori A Parker
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